1					
2					
3					
4					
5					
6					
7					
8					
9					
10	INITED STATES	DISTRICT COLIDT			
11	UNITED STATES DISTRICT COURT  NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION				
12   13	NORTHERN DISTRICT OF CAL	LIFORNIA, OAKLAND DIVISION			
14	CHASOM BROWN, et al., on behalf of themselves and all others similarly situated,				
15	Plaintiffs,	Case No. 4:20-cv-03664-YGR-SVK			
16 17	VS.	<del>[PROPOSED]</del> ORDER GRANTING MOTION TO SEAL			
18 19	GOOGLE LLC,  Defendant.	Referral: Hon. Susan van Keulen, USMJ			
20	PATRICK CALHOUN, et al., on behalf of themselves and all others similarly situated,				
21	Plaintiffs,	Case No. 4:20-cv-05146-YGR-SVK			
22	VS.	<del>[PROPOSED]</del> ORDER GRANTING MOTION TO SEAL			
23	GOOGLE LLC,	Referral: Hon. Susan van Keulen, USMJ			
24	Defendant.	Telefiai. Hom. Susun van Realen, Contr			
25					
26					
27					
28		Case No. 4:20-cv-03664-YGR-SVK -1- Case No. 4:20-cv-05146-YGR-SVK			
	[PROPOSED] OR	RDER GRANTING ADMINISTRATIVE MOTION TO SEAL			

1

2

3

4

5

## [PROPOSED] ORDER

Before the Court is Google LLC's Administrative Motion to Seal ("Motion") portions of the Joint Status Report Pursuant to *Brown* Dkt. No. 830 and *Calhoun* Dkt. No. 960.

Having considered the Motion, supporting declaration, and other papers on file, and good cause having been found, the Court **ORDERS** as follows:

6 7	Documents Sought to Be Sealed	Court's Ruling on Motion to Seal	Reason(s) for Court's Ruling
8	Joint Status Report Pursuant	GRANTED as to the portions at:	The information requested to be sealed contains non-public, sensitive confidential business
9	to Brown Dkt.	•	information related to Google's internal
10	No. 830; Joint Status Report	Pages 1:11-12, 1:14, 1:23, 1:25, 1:28, 2:1-3, 2:5-6,	technological systems that could affect Google's competitive standing and may expose Google to
11	Pursuant to Calhoun Dkt. No.	2:9-10, 2:13-15, 2:18-19, 2:24, 3:5-9, 3:12, 3:19, 4:3-	increased security risks if publicly disclosed, including various types of Google's internal
12	960	6, 4:8, 4:16, 4:27, 5:2, 5:13, 5:27, 6:13-14, 6:16-22,	projects, internal data sources, and their proprietary functionalities, which Google maintains as
13		6:24-28, 7:1-2, 7:7, 7:9, 7:12	confidential in the ordinary course of its business and is not generally known to the public or
14			Google's competitors. Such confidential
15			information reveals Google's internal systems and operations. Public disclosure of such confidential
16			information could affect Google's competitive standing as competitors may alter their system
17			designs and practices relating to competing products, time strategic litigation, or otherwise
18			unfairly compete with Google.
19	Exhibit 1 to Trebicka	GRANTED as to the portions at:	The information requested to be sealed contains non-public, sensitive confidential business
20	Declaration – Jan. 10, 2023 <i>Brown</i>	Pages 7:15-16, 8:9-10,	information related to Google's internal technological systems that could affect Google's
21	Hearing Transcript	8:18, 8:21-22, 9:2-3, 9:5, 9:25, 12:5, 12:18, 12:25,	competitive standing and may expose Google to increased security risks if publicly disclosed,
22	Tunscript	13:4, 15:16-18, 15:25,	including various types of Google's internal
23		16:8, 16:11-12, 17:6, 17:8, 18:6-10, 18:13-16,	projects, internal data sources, and their proprietary functionalities, which Google maintains as
24		18:18, 19:17-18, 20:11, 21:23-24, 22:25, 26:10,	confidential in the ordinary course of its business and is not generally known to the public or
25		28:10, 28:21-22, 29:1-2, 29:4-7, 29:10-11, 29:16,	Google's competitors. Such confidential information reveals Google's internal systems and
26		30:4, 31:23, 34:22-24,	operations. Public disclosure of such confidential
27		35:19, 35:22-23, 35:25	information could affect Google's competitive standing as competitors may alter their system
28			designs and practices relating to competing

Case No. 4:20-cv-03664-YGR-SVK Case No. 4:20-cv-05146-YGR-SVK

1					products, time strategic litigation, or otherwise unfairly compete with Google.
2	Exhibit 2 to	GRANTED	as t	o the	The information requested to be sealed contains
3	Trebicka Declaration – Jan.	portions at:			non-public, sensitive confidential business information related to Google's internal
4	26, 2023 Letter to	Pages 1-6			technological systems that could affect Google's
5	Brown and Calhoun				competitive standing and may expose Google to increased security risks if publicly disclosed,
6					including various types of Google's internal projects, internal data sources, and their proprietary
7					functionalities, which Google maintains as
$_{8}$					confidential in the ordinary course of its business and is not generally known to the public or
9					Google's competitors. Such confidential information reveals Google's internal systems and
10					operations. Public disclosure of such confidential
11					information could affect Google's competitive standing as competitors may alter their system
12					designs and practices relating to competing products, time strategic litigation, or otherwise
					unfairly compete with Google.
13	Exhibit 3 to Trebicka	GRANTED portions at:	as t	o the	The information requested to be sealed contains non-public, sensitive confidential business
14	Declaration – Jan.				information related to Google's internal
15	28, 2023 Letter to Brown and	Pages 1-3			technological systems that could affect Google's competitive standing and may expose Google to
16	Calhoun				increased security risks if publicly disclosed, including various types of Google's internal
17					projects and internal databases, which Google
18					maintains as confidential in the ordinary course of its business and is not generally known to the
19					public or Google's competitors. Such confidential information reveals Google's internal systems and
20					operations. Public disclosure of such confidential
21					information could affect Google's competitive standing as competitors may alter their system
22					designs and practices relating to competing products, time strategic litigation, or otherwise
23					unfairly compete with Google.
24	Exhibit 4 to Trebicka	GRANTED portions at:	as t	o the	The information requested to be sealed contains non-public, sensitive confidential business
25	Declaration – Jan.				information related to Google's internal
26	30, 2023 Letter to Brown and	Pages 1-4			technological systems that could affect Google's competitive standing and may expose Google to
27	Calhoun				increased security risks if publicly disclosed, including various types of Google's internal
					projects, internal data sources, and their proprietary
28					functionalities, which Google maintains as  Case No. 4:20-cv-03664-YGR-SVK

Case No. 4:20-cv-03664-YGR-SVK Case No. 4:20-cv-05146-YGR-SVK

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	Trebicka Exhibit 5 – Jan. 10, 2023 <i>Calhoun</i> Hearing Transcript	GRANTED as to the portions at:  Pages 5:25, 6:2, 6:4, 6:13, 8:1, 8:3, 17:11, 18:20, 18:25, 19:1-2, 21:1, 21:22, 22:21, 25:5, 25:17, 25:20, 25:23, 26:4, 26:8-10, 26:16-17, 28:1	confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential information reveals Google's internal systems and operations. Public disclosure of such confidential information could affect Google's competitive standing as competitors may alter their system designs and practices relating to competing products, time strategic litigation, or otherwise unfairly compete with Google.  The information requested to be sealed contains non-public, sensitive confidential business information related to Google's internal technological systems that could affect Google's competitive standing and may expose Google to increased security risks if publicly disclosed, including various types of Google's internal projects and internal databases, as well as internal metrics, which Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential information reveals Google's internal systems and operations. Public disclosure of such confidential information could affect Google's competitive standing as competitors may alter their system designs and
17 18	Trebicka Exhibit	GRANTED as to the	strategic litigation, or otherwise unfairly compete with Google.  The information requested to be sealed contains
19	6 – Jan. 23, 2023 Correspondence	portions at:	non-public, sensitive confidential business information related to Google's internal
20		Pages 1, 3-4	technological systems that could affect Google's competitive standing and may expose Google to
21			increased security risks if publicly disclosed, including various types of Google's internal
22			projects and internal databases, which Google maintains as confidential in the ordinary course of
23			its business and is not generally known to the public or Google's competitors. Such confidential
24			information reveals Google's internal systems and operations. Public disclosure of such confidential
25			information could affect Google's competitive
26			standing as competitors may alter their system designs and practices relating to competing
27			products, time strategic litigation, or otherwise unfairly compete with Google.
28			

Case No. 4:20-cv-03664-YGR-SVK Case No. 4:20-cv-05146-YGR-SVK

1	SO ORDERED.		
2	DATED:	March 20, 2023	THE HONORABLE SUSAN VAN KEULEN
3			United States Magistrate Judge
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18 19			
20			
21			
22			
23			
24			
25			
26			
27			
28			
			Case No. 4:20-cv-03664-YGR-SVK -5- Case No. 4:20-cv-05146-YGR-SVK
		[	ROPOSED] ORDER GRANTING ADMINISTRATIVE MOTION TO SEAL